

Applicants acknowledge the acceptance of the informal drawings filed with this application for examination purposes only. Applicants will have formal drawings prepared upon receipt of an indication that these claims are allowable.

The specification has been objected to, and claims 25, 30-33 and 38-44 have been rejected, under 35 U.S.C. § 112, first paragraph. The Office Action alleges that the specifically disclosed target-specific components on pages 12 and 13 of the specification do not provide a basis for all of the target-specific components encompassed by the present claim language. Applicants respectfully traverse this objection and rejection.

Applicants have made it quite clear in the specification that the invention is "applicable to effecting toxicity against any desired target." (Specification, page 13, lines 9-13.) Applicants also expressly state in the specification that, "once the target tissue is known, an antibody specific for this tissue may be prepared by conventional means." (Page 13, lines 10-12.) As to ligands specific for receptors on cell surfaces, Applicants specifically state that "a wide variety of cell types of specific receptors" are useful and that the term "ligand" refers to any substance, natural or synthetic, that binds specifically to a receptor. (Page 13, lines 17-25.) Because these materials and methods for determining and making them are known to one of ordinary skill in the art, a

wide variety of target-specific components is clearly appropriate.

Further, in the event that there would be any doubt, Applicants have also supplied extensive lists of exemplary materials. Specifically, useful examples of target-specific components include antibodies that are capable of binding to particular antigens (page 4, line 30), which includes both monoclonal antibodies (described at page 12, lines 3, 10 and expressly enabled at lines 23-30) such as CAMAL1 (enabled at page 12, line 35 through page 13, line 2) and polyclonal antibodies (described at page 12, lines 10 and expressly enabled at lines 19-28), such as immunoglobulins, immunologically reactive fragments thereof (described at page 12, lines 6-9 and expressly enabled at lines 30-33), e.g., $F(ab')_2$, FAB, or FAB' fragments (page 12, lines 12-13), anti-M1 antibody (described and enabled at page 13, lines 2-4), and B16G antibody (described and enabled at page 13, lines 4-8).

Additional examples are ligands that are capable of binding specific receptors such as cellular receptors (page 4, lines 30-32; page 12, lines 3-4; page 13, lines 14-17). Specific examples of such ligands include:

1. steroid hormones, such as progesterone, estrogens, androgens, and the adrenal cortical hormones (page 13, lines 19 and 26-28);
2. growth factors, such as epidermal growth factor, nerve growth factor, and fibroblast growth factor (page 13, lines 19-20 and 28-30);

3. other protein hormones, such as human growth hormone and parathyroid hormone (page 13, lines 30-32);
4. neurotransmitters, such as acetylcholine, serotonin, and dopamine (page 13, lines 20 and 32-33); and
5. analogs of these substances that succeed in binding to a receptor (page 13, lines 33-35).

Thus, at least three major categories of antibody-type of target-specific components and at least 5 different categories of ligand-type target-specific components have been provided, along with numerous specific examples in most of these categories. Applicants need not describe every conceivable type of target-specific component to enable the claimed invention, but must merely provide sufficient information to enable the ordinary artisan to make and use the invention. Applicants respectfully submit that significantly more information than would be required simply to provide an enabling disclosure has already been supplied.

Because all of the rejected claims meet the requirements for an enabling disclosure as discussed above, all claims depending from these claims also meet the requirements of section 112.

In view of foregoing remarks, Applicants respectfully submit that the rejection of claims 25, 30-33 and 38-44 under 35 U.S.C. § 112, first paragraph, is misplaced and should be withdrawn. Accordingly, the allowance of all pending claims (25-44) is hereby requested.

Should the Examiner consider that any matter requires further explanation or minor correction, he is courteously invited to call the undersigned counsel.

Respectfully submitted,

By: Patricia M. Drost
Patricia M. Drost
Registration No. 29,790

MORRISON & FOERSTER
2000 Pennsylvania Avenue, N.W.
Washington, D.C. 20006-1812
Tel: (202) 887-1500
Fax: (202) 887-0763